

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

PHILLIP L. THOMAS
7649 Fir Drive
Temperance, MI 48182,

CASE NO. _____

And

JUDGE _____

KRISTINE N. THOMAS
7649 Fir Drive
Temperance, MI 48182,

COMPLAINT

Plaintiffs,

v.

Trial Counsel:

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Defendant.

Attorney for Plaintiffs

1. The Plaintiffs are citizens of the State of Michigan and the Defendant is a citizen of the State of Ohio. The amount in controversy without interest and cost exceeds the Seventy-five Thousand (\$75,000.00) Dollars.

2. Plaintiffs say that the Plaintiff Phillip L. Thomas came under the care and treatment of the Defendant for his dental needs for several years, up through and including the year 2015. Further Plaintiffs say that on or about September 26, 2016 Plaintiff served upon the Defendant notice extending the statute of limitations in this matter 180 Days.

3. Dental care and treatment given by the Defendant was negligent and such negligent dental care and treatment proximately caused injuries to the Plaintiff Phillip L. Thomas requiring him to undergo multiple procedures and incur expenses in excess of Thirty Thousand (\$30,000.00) Dollars. In addition to incurring these expenses Plaintiff Phillip L. Thomas was subject to great pain of body and mind, suffered a loss of enjoyment of life, was prevented from transacting his normal business, and is informed and believes that the effects of said injuries are permanent in nature.

4. Plaintiff Kristine N. Thomas restates the preceding paragraphs and says that at all times she has been the spouse of the Plaintiff Phillip L. Thomas and as a direct and proximate result of the injuries sustained by him has been deprived of his services, companionship, affection and consortium, and she is informed and believes that such deprivation is permanent in nature.

WHEREFORE, Plaintiffs demand judgment against the Defendant in an amount in excess of Seventy-five Thousand (\$75,000.00) Dollars with interest and costs.

Respectfully submitted,

MOLLENKAMP & INGRAM

/s/ Alan L. Mollenkamp
Alan L. Mollenkamp
Attorney for Plaintiffs

ALM/mjf
March 14, 2017
17-107